



THE CITY OF NEW YORK
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May 27, 2021

BY ECF

Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Miranda v. City of New York et al.
Civil Action No. 21-CV-00714
Law Dept. No.: 2021-002807

Dear Judge Cote:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced proceeding. I write in accordance with Your Honor's Individual Rules of Practice to respectfully request an extension of time from May 28, 2021 until June 28, 2021 for Defendants to respond to the Complaint, and for a corresponding adjournment of the initial conference presently scheduled for June 11, 2021. Additionally, the parties respectfully request that this case be referred to a magistrate judge for an early settlement conference.

This extension request is made because I am in need of additional time to prepare Defendants' response to the Complaint and because the parties have conferred and believe this case may be ripe for early settlement. This is the third request for an extension to respond to the Complaint in this matter. Prior extensions of time were granted on March 10, 2021, ECF No. 13, and April 27, 2021, ECF No. 15. Plaintiff's counsel, Denise Schulman, consents to this extension.

The parties believe an early resolution to this case may be possible, and accordingly, respectfully request that the Court refer this case to the designated magistrate judge for a settlement conference. The parties also respectfully request that the initial conference, presently scheduled for June 11, 2021, be adjourned. Both counsel are available for a conference during the week of July 12th, with the exception of July 13th and the afternoon of July 16th.

*The parties shall immediately
contact Magistrate Judge Heikman
to schedule settlement discussions.
The answer is due 6/28/21. There
shall be no further adjournment.
The parties shall submit
a proposed discovery schedule
by 7/12/21. The 6/11 conference
is cancelled.*

*Amildner
5/27/21*

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Alana R. Mildner
Assistant Corporation Counsel

CC: By ECF

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